

BLYTH ESTUARY: DRAFT STRATEGY CONSULTATION RESPONSE

Final Report

1. Summary

- 1.1 The final round of consultation on the Blyth Strategy commenced at the end of September 2007, when the draft was launched at Walberswick on 28th and Reydon on 29th. The end date for responses to the consultation was 29th February 2008.
- 1.2 About 350 people attended the drop-in sessions, of whom 93 filled in response sheets. 37 of the people who filled in responses said that the drop-in session had been helpful, and were either complimentary about the drop-in session and/or the proposals, or had no further comments to make. The other respondents expressed concerns about the proposals. The most frequent concern was regarding possible future impacts to the harbour resulting from increased flows through the estuary mouth.
- 1.3 Written responses or emails were received from 100 organisations or individuals. The main concerns were the impacts on properties and infrastructure (especially roads), the potential future impact on the harbour area and the associated tourism and economy of the area, and the loss of farmland and nature conservation assets.
- 1.4 Many respondents also felt that the economic appraisal had not been undertaken correctly. This particular issue was taken up by the local authorities, who commissioned two reviews that were critical of the methodology.
- 1.5 In response to the points made, a number of measures have been taken. Most importantly, we have continued to discuss possible future management options with key organisations through the consultation period and beyond. Through these discussions we have developed a better understanding of how the estuary might be managed more collaboratively in the future.
- 1.6 A review of the economic appraisal was undertaken, with advice from our national economists. It concluded that the initial assessment was broadly correct, although some of the asset values have been revised.
- 1.7 Subsequent to the launch of the draft strategy, detailed surveys of property levels were undertaken to allow a more accurate assessment of the change in flood risk that would occur as a result of the draft strategy. This work has made it possible to confirm where localised protection may be possible.
- 1.8 In response to the issues raised, the continuing discussions with key stakeholders, and taking account of additional information, the proposed strategy has been modified in a number of ways. Whilst it is confirmed that national flood defence funding cannot be justified for rebuilding any of the banks, there is greater clarity on those flood banks which could legitimately

receive local levy funding. This provides the basis for discussing possible future collaborative projects, potentially involving local communities.

2. Introduction

- 2.1 The first consultation on a Flood Risk Management Strategy for the Blyth Estuary was undertaken in February 2004, when stakeholders were asked to comment on the Blyth Estuary Strategy Options Consultation Document. This was followed in October 2004 by the Option Shortlisting Consultation Document, and the Preferred Option Consultation document was issued in September 2005. However, the Preferred Option was heavily criticised – the Chief Executive of the Environment Agency received about 200 letters objecting to the strategy. Consequently, a thorough review of the proposals was then undertaken. As a result of this review, and taking account of the criticisms received, revised proposals for managing the flood defences around the Blyth Estuary were issued as the draft Blyth Estuary Strategy on 27th September 2007. The consultation period for the draft ended on 29th February 2008.
- 2.2 A list of issues raised by consultees is given in Appendix 1.

3. Drop-in sessions

- 3.1 Drop-in sessions were held at Walberswick on 27th and at Reydon on 28th September 2007. A range of Environment Agency staff were available to explain the strategy and answer questions. About 350 people attended the two drop in sessions. Visitors to the drop-in sessions were invited to fill in response sheets. 93 response sheets were completed. 37 of the people who filled in responses (just under 40%) said that the drop-in session had been helpful, and were either complimentary about the drop-in session and/or the proposals, or had no further comments to make.
- 3.2 Of those respondents who expressed concerns about the proposals, the majority were concerned about impacts on the harbour (13), or commented that funding for a hold the line approach should be made available by Government or through working with other bodies (12).
- 3.3 Six people thought the consultation process was ineffective, or that greater stakeholder engagement was needed to finalise the strategy. Four people expressed general dissatisfaction with the proposals, and three thought the money spent on preparing the strategy would have been better spent on maintenance.
- 3.4 Specific concerns raised about the proposals by more than one respondent were impacts on residential properties (5), loss of footpaths (3), impacts on roads (3), loss of farmland (2), impact on tourism (2), need for localised protection for properties (2).
- 3.5 Six of the people who filled in response sheets at the drop-in sessions subsequently submitted more detailed comments either by letter or email.

4. Written responses and emails

- 4.1 Consultees were invited to send written responses or to email their views. A dedicated Blyth Estuary email account was established to facilitate this process. A total of 100 individuals or organisations sent letters and/or emails. Nineteen people expressed general dissatisfaction with the proposals. Nine expressed the view that the consultation process had been ineffective and/or that stakeholder involvement would be needed to work up solutions. Nine people asked for more information. Seven respondents expressed support for the general direction of the strategy, whilst six specifically expressed an objection or rejection of the draft proposals.
- 4.2 Specific issues that consultees were most concerned about were:
- Impacts on houses, property values, businesses and insurance for property in the floodplain (28)
 - Impacts on the A12 and other roads and the knock-on effect this could have on local economy (24)
 - The approach to economic appraisal on which the draft strategy was based (23)
 - The impact on tourism at Southwold and Walberswick (21)
 - The loss of farmland and/or food production (19)
 - Loss of freshwater habitats at Tinkers Marsh and Hen Reedbeds and/or the need for these to be replaced by new habitats (19)
 - The lack of Government funding for a hold-the-line approach, and/or the need to secure more (17)
 - Impacts on the Area of Outstanding Natural Beauty (AONB) and landscape issues (13)
 - Impact on the harbour, the effect on moorings, navigation issues and the loss of employment if the harbour area changed (13)
 - Impacts on footpaths (12)
 - The need for a more holistic approach to estuary management, and/or the need for an Integrated Coastal Zone Management (ICZM) approach (11)
 - The need for localised protection measures for properties that could be flooded (9)
 - The impact on coastal and/or rural economies (8)
- 4.3 Whilst not strictly relating to the draft strategy, it should be noted that fifteen consultees wrote expressing concerns about the impact of the storm surge that caused failure of defences on 9th November 2007. In general, the consultees wanted the breaches to be filled and walls repaired.

5. Details of statutory consultee and other key responses

Natural England (NE)

- 5.1 Natural England's Norfolk and Suffolk Government Team provided a five page response welcoming the preparation of a strategy and accepting that it will not be possible to manage the estuary in future by maintaining the present

line of defence. It considered that the draft strategy was a realistic approach to tackling the climate change challenge.

5.2 However, the Natural England response did draw attention to a number of issues where it considered further work was required. In outline these were as follows:

- More clarity is required regarding what is meant by ‘withdrawal of maintenance’, in particular that the extent to which the banks are expected to fail in future is made clear.
- Whilst NE supports the approach to bank management and future loss of freshwater habitats included in the SPA and Ramsar sites, that this matter needs to be covered by completion of the ongoing Appropriate Assessment, and the necessary habitat creation will be through the Regional Habitat Creation Programme.
- There are impacts on SSSI features that do not form part of the SPA and Ramsar designations. NE considered these impacts could have been considered more comprehensively. It was also unclear whether implementation of the strategy would result in the creation of sufficient intertidal habitats to redress losses and restore the SSSI to favourable condition. They asked for the development of intertidal habitats to be kept under review so that further action could be taken in future as necessary for this purpose.
- NE drew attention to changes in the legislation with regard to water vole conservation and the need to create new habitat for this species to counter losses due to bank failure.
- There are non-statutory nature conservation sites within the estuary floodplain for which NE felt the proposed mitigation measures were inadequate. NE also drew attention to the requirement to ensure no net loss of coastal grazing marsh.
- NE agrees with the conclusions of adverse effect on landscape, recreation and amenity, and considers that the proposed mitigation measures would not fully mitigate the impacts. In particular it recommended that the Environment Agency work with the Highways Authority, Local Access Forum and user groups to help resolve the issues relating to maintenance of an effective public right of way network.

English Heritage

5.3 In their letter of 29th February 2008, English Heritage expressed the view that the SEA did not adequately identify the impact on archaeological remains and listed buildings, and in particular that it was not clear whether they could be expected to survive *in situ*.

Local authorities

5.4 Suffolk Coastal District Council, Suffolk County Council and Waveney District Council formed the Blyth Estuary Strategy Group to coordinate their response to the draft strategy. It includes both elected members and key staff from the three councils. The group provided a detailed response which

concluded that the Environment Agency's (EA) proposed management strategy for the Blyth Estuary was unacceptable because of its impacts on:

- The local economy, both local to the Blyth and a substantial area which is reliant on the tourism and employment related activities associated with the Blyth, together with areas for which the A12 is a critical transport link including the regional priority area for regeneration at Lowestoft
- Local communities and residents
- Local infrastructure including the A12 as a principal arterial access route and the A1095 road as a local distributor, Southwold harbour, water extraction and sewerage infrastructure
- The character of the AONB
- Important Habitats
- Public access and rights of way

5.5 The group further considered that there were substantial limitations and problems with the analysis and approach underpinning the development of the strategy. Accordingly, it felt that whilst a large amount of sound technical work had been undertaken, the appraisal was not considered to be robust in its conclusions. The principal concerns were briefly as follows:

- The economic appraisal has significant flaws.
- The Environmental Appraisal does not demonstrate that the obligations under the Countryside and Rights of Way Act (2000) have been met, nor is there clarity as to how the obligations under the Habitats directive on replacement habitats will be met.
- The appraisals do not consider the consequences for the coastline of the draft strategy.
- Decisions on the affordability of a 100 year strategy are inappropriately based.
- Acceptance of the strategy would transfer costs to other authorities and organisations, not least the highway authority, all of whom face similar financial constraints to the EA.
- The strategy does not embrace the philosophy of Integrated Coastal Zone Management (ICZM).
- No allowance has been made for the cumulative impacts of subsequent estuary strategies on environmental, social and economic assets.
- No review process for the Strategy is proposed.
- The EA is proposing to spend up to £16M to implement a withdrawal of maintenance policy. The appraisal has not taken this into account. (This £16M figure was the estimated cost of the draft strategy taking account of future maintenance and purchase of replacement habitat.)

5.6 The group commissioned two reviews on the economic appraisal, both of which were critical of some of the methodology.

- 5.7 This group represents local landowners and local people with a particular interest in the estuary and harbour. It submitted a detailed response criticising the science base for the draft strategy and the recent management of the flood defences.

6. Initial response

- 6.1 Organisations and individuals who sent emails or written submissions commenting on the strategy normally received a direct response. The responses acknowledged the comments made and sought to provide clarification where appropriate. In order to respond to the more detailed submissions sent in by some organisations, further liaison and study was required to revise the strategy.

7. Consideration of responses

- 7.1 All matters raised by consultees were considered prior to finalising the proposed strategy. In response to points raised, a number of additional steps were taken.
- 7.2 Subsequent to the launch of the draft strategy, detailed surveys of property levels were undertaken to allow a more accurate assessment of the change in flood risk that would occur as a result of the draft strategy. A letter was then sent to each property owner to advise them of the outcome and to confirm the flood risk. Further to this, the possibility of providing local protection to properties in the floodplain was investigated. This involved estimating the cost of providing a defence, and establishing the benefit-cost ratio. This work has made it possible to confirm where localised protection may be possible in the finalised strategy.
- 7.3 In view of the criticism of our economic appraisal, we undertook a review which considered all the points raised. In particular, we wanted to see whether there were additional assets we could include in the assessment, or whether it would be reasonable to increase the value we had attributed to the assets. An issue that had raised particular concern was the capping of the road impacts at the cost of providing localised protection to maintain traffic flows. There was also considerable unease about the approach we had adopted in calculating impacts on the harbour and to tourism. In undertaking the review we referred any issues we were uncertain about to our national economists for advice.
- 7.4 As a result of the review, we have been able to increase the asset values in some of the flood cells. However, we have concluded that the treatment of roads, the harbour and tourism are generally sound, and comply with national guidance. The situation remains the same in that we cannot justify the expenditure that would be needed to replace any of the existing flood defences as it would not attract national funding. The proposed final strategy has broad similarities to the draft strategy.
- 7.5 Through the consultation period and beyond, we have continued to discuss possible future management options with key organisations. In particular we

have had a number of meetings with the local authorities Blyth Strategy Group on several occasions, and with the Blyth Estuary Group. We have also continued our dialogue with Natural England and the RSPB on wildlife issues. Through these discussions we have developed a better understanding of how the estuary can be managed in a more collaborative way in the future. The strategy has been modified to ensure it allows for the involvement of others. We are keen to continue existing dialogues to progress future collaborative approaches.

8. Changes to the strategy

8.1 We have listened to the concerns of consultees, and where we have flexibility we have been able to make some important changes to the draft strategy. The principle modifications are:

1) A future provision of an improved bank along the line of Buss Creek, to provide a continuing defence to Town Marsh and the properties in Ferry Lane in the event of a breach in the Reydon Bank is incorporated into the strategy. This bank will not attract national funding and would require local funding sources to be identified. If funding can be found, the bank should be in place by year 5, when public funding is to be withdrawn from maintenance of the Reydon bank.

2) Our investigations confirm it would be economic to provide a retreated defence to properties in the floodplain on the edge of Walberswick. We will consult further with residents to see whether this would be appropriate, with a view to constructing a defence prior to the eventual failure of the bank protecting Robinsons Marsh. This bank would need to be in place by year 20, subject to review of the state of the bank fronting Robinsons Marsh.

3) In view of representations made by the Blyth Estuary Group and others, and in close consultation with Natural England, the strategy allows for actions by others to maintain or rebuild defences around the estuary, subject to the normal consenting process. Preventing the inundation of large tracts of marshland will reduce future erosion in the harbour area.

4) A contingency fund has been approved by the RFDC which might be called upon if a bank such as Reydon failed in a future surge event. It is recognised that failure of this bank would be a high priority for repair due to potential impacts on other assets within the estuary. We will work with others to try to develop a suitable funding and management regime for this bank. We will keep the period of withdrawal of maintenance under regular review, and will continue to maintain the bank for longer than 5 years if there has been no substantial damage and funds allow.

5) Reassessment of the economics for flood compartment 6 confirms that provision of a defence to protect the A1095 and Hen Reedbeds would be economic if Reydon bank cannot be maintained. The strategy does not include provision of such a bank, but allows for the possible provision of a new defence along the east side of the road, subject to the availability of local funds. If funding is available this should be constructed by year 5.

6) A short length of defence could be provided to maintain the existing level of protection to Marsh Cottages when the bank fronting Reydon Marsh fails. This should be constructed by year 5, subject to the availability of local funding.

7) It is confirmed that no localised protection will be provided for properties at Church Lane, Blythburgh. This is because detailed levels surveys confirmed that all dwellings were above the level of the river bank.

8) Following the damage caused by the storm surge on 9th November 2007, we concluded no further expenditure could be justified in maintaining the Tinkers Marsh bank.

9) Subsequent to the damage to the bank fronting Tinkers Marsh, works have been substantially completed to strengthen the old railway bank at the eastern end of the marsh. This provides a new, retreated line of defence for Robinsons Marsh and low-lying properties on the edge of Walberswick.

9. Next steps

9.1 The following actions are now proposed.

- 1) Seek the views of the Regional Flood Defence Committee and then seek approval to the strategy from the National Review Group by submission in autumn 2008
- 2) Complete remaining internal approvals early in 2009
- 3) Adopt the strategy
- 4) Work with other organisations to seek collaborative actions, perhaps including improvement of some defences and better management around the estuary – we will do this whilst continuing maintenance of the key banks in the estuary
- 5) Consider making contributions to third parties that take on bank management
- 6) Review the strategy five years after adoption.

APPENDIX 1: LIST OF ISSUES RAISED BY CONSULTEES

Drop-in sessions

1. the drop-in session helped me understand the proposals – either no additional comments at this stage or complimentary about the drop-in sessions and/or agree with what is proposed or no comment at this stage (37)
2. Impact on the harbour, the effect on moorings, navigation or loss of employment due to these impacts (13)
3. Comments about the need for more funding to allow a hold-the-line approach to be adopted (12). Comments focussed on a lack of Government funding and the need for more such funding, (7) or the need to identify a wider approach to fund raising (5).
4. Lack of effective consultation and/or the need to involve stakeholders in finalising proposals (6).
5. Impact on houses, including accuracy of available information, property values, businesses, insurance (5)
6. General dissatisfaction expressed about the proposals (4)
7. Impacts on the A12 and other roads (3)
8. comments to the effect that the strategy was a waste of money or that the money would have been better spent on undertaking maintenance (3)
9. concern about loss of footpaths (3)
10. concern about loss of farmland (3)
11. suggested alternative solutions to managing flooding in the estuary (3)
12. Impact on tourism at the harbour and in Southwold and Walberswick (2)
13. the need for local protection measures for houses liable to flooding (2)
14. the need for compensation payments for those affected by the strategy (1)
15. suggestion that local communities could have a role in managing the defences (1)
16. query about the impact of dredging in the North Sea (1)
17. concerns about ineffective maintenance in the past (1)
18. the need for greater public awareness of the plans (1)
19. expression of feeling that the local community has been betrayed (1)
20. disappointment that more funds cant be made available (1)
21. The view that we will have to learn to adapt (1)
22. a query about maintenance of a defence (1)

Written responses and emails

2. Impact on harbour, the effect on moorings, use of harbour by boats, loss of navigation, loss of jobs there (13)
3. Comments about the need for more funding to allow a hold-the-line approach to be adopted (23). Comments focussed on a lack of Government funding and the need for more such funding, (17) or the need to identify a wider approach to fund raising (6).
4. Lack of effective consultation and/or the need to involve stakeholders in finalising proposals (9).
5. Impact on houses, including accuracy of available information, property values, businesses, insurance (28)
6. General dissatisfaction expressed about the proposals (19)

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7. Impacts on the A12 and other roads (24)
8. comments to the effect that the strategy was a waste of money or that the money would have been better spent on undertaking maintenance (6)
9. Loss of footpaths (12)
10. Loss of farmland, including food production (16)
11. suggested alternative solutions to managing flooding in the estuary (3)
12. Impact on tourism at the harbour and in Southwold and Walberswick (21)
13. the need for local protection measures for houses liable to flooding, or advice requested for protecting or flood proofing property (10)
14. the need for compensation payments for those affected by the strategy (4)
15. suggestion that local communities could have a role in managing the defences (4)
16. query about the impact of dredging in the North Sea (3)
17. concerns about ineffective maintenance in the past (7)
23. support for the general direction of the strategy (7)
24. outright objection to the proposals (6)
25. concern about the loss of freshwater habitats at Tinkers Marsh and Hen Reedbeds, including the need for replacement habitats if they are lost, and timeliness of creation of new habitats (19)
26. question regarding the wisdom of recreating habitats rather than continuing to defend them (7)
27. concerns about the economic appraisal (23)
28. comments about the impacts of the storm surge on 9th November and the need for repairs (15)
29. requests regarding availability of strategy documentation (9)
30. impacts on the AONB and landscape impacts (13)
31. the need for a more holistic approach and/or the need for an ICZM approach to estuary management (11)
32. the impact on coastal/rural communities (8)
33. hold the line policy needed, at least until increased sea level rise is evident (8)
34. the accuracy of sea level rise projections used in the strategy and/or scepticism about global warming (5)
35. lack of evidence for increase in sea level rise/storm surges and the relevance of such future predictions (4)
36. queries and comments regarding withdrawal of maintenance procedures and future maintenance proposals (6)
37. questioning the cost-effectiveness of a do-nothing policy (5)
38. claim that the strategy is not based on sound science (4)
39. impacts on sewers (4)
40. impacts on water supply (4)
41. queries about flood management legislation (3)
42. query regarding the relationship with Buss Creek and the Southwold Strategy (1)
43. general queries regarding hydrodynamics (1)
44. issues around management of the sand dunes at the Denes/Walberswick (2)
45. impacts on energy usage/carbon emissions (2)
46. flooding in Halesworth and Wangford (1)
47. support for thoroughness of the evaluation/assessment (2)
48. Lack of evidence for coastal squeeze (2)
49. lack of evidence that tidal prism is increasing (1)

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50. general criticism of the SEA (1)
51. support for recommendations on fisheries impacts in the SEA (1)
52. insufficient assessment of historic environment in SEA (2)
53. relationship with SMP/impact on Walberswick/wider coast (1)
54. need for review of the strategy at future dates (1)
55. lack of cumulative assessment of estuary strategies (1)
56. contention that there is a failure to meet all appropriate and statutory requirements (1)
57. criticism of the length of time taken to complete the strategy (1)
58. criticism for making decisions (Tinkers Marsh) in advance of adoption of strategy (1)
59. the need for a cheaper approach/use free materials for maintaining defences (2)
60. complaint about the consultation process/drop-in sessions (2)
61. birds v people debate (2)
62. impact on navigation up-river (1)
63. need for further consideration of impacts on SSSI features not dealt with in the Appropriate Assessment (1)
64. wish to input to Appropriate Assessment (1)
65. need to ensure intertidal habitats develop/explain more clearly in strategy (1)
66. impacts on Water Voles (1)
67. need to ensure no net loss of BAP habitats (1)